



State of New Jersey

Department of Environmental Protection

DONALD T. DiFRANCESCO
Acting Governor

Robert C. Shinn, Jr.
Commissioner

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

NO. 7000 1670 0013 7837 0572

AUG 23 2001

Mr. Cristopher Anderson
Director Environmental Affairs
L.E. Carpenter & Company
Suite 36-5000
200 Public Square
Cleveland, OH 44114-2304

Dear Mr. Anderson:

Re: L. E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) and EPA have reviewed the document regarding Enhancement of Free Product Recovery, dated May 2001 and have the following comments:

1. The previous work plan dated August 15, 2000 outlined scopes of work for several technologies, however, not only does the latest submittal fail to address EPA's comments, the evaluation of all but the trench technology were dropped from the plan, and no explanation was provided. The change in the scope of work must be formally explained.
2. This document proposes the installation of a trench through the long axis of the free product area. As a conceptual design, the approach is adequate. However, detailed design documents must be submitted for review, including full drawings of construction activities, plans for sampling the excavated materials for disposal purposes, and in general should provide information on how the trench will be constructed and operated. In addition, a health and safety plan is also necessary, and must cover potential exposure to contaminants during excavation and disposal activities, as well as entry into the trench. Furthermore, details on how the construction water/groundwater that will be encountered is to be treated must be provided as well as a sampling plan for the lead contaminated soils that will be encountered.
3. It is stated that the contaminated ground water will be treated through carbon absorption units and then released via a NPDES approved discharge or to the POTW system. During the 1993 Feasibility Study both of these options were dismissed in

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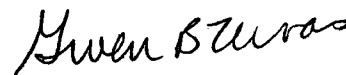
favor of reinjection/reinfiltration of treated ground water due to the difficulty meeting NPDES discharge limits and refusal of the local POTW to accept treated ground water. L.E. Carpenter must investigate additional options for treated ground water disposal.

4. The work plan dated August 15, 2000 stated that a flow model would be utilized to estimate the rate of free product recovery and the extent of the capture zone for the trench. It was also stated in the same document that the model would be used to predict the expected project duration for each trench design scenario and the estimated recoverable volume of free product. L.E. Carpenter must develop a defensible model using site specific data to support the trench design and address the above concerns.
5. Please note that specific criteria will need to be established that will serve as a trigger for additional efforts. For example, the criteria may address when it will become necessary to rehabilitate the trenches (in the event they become silted or overgrown), or to enhance reduced flow into the trench. In addition, criteria should be established which indicate that the source has been adequately remediated. However, these criteria may be established after the construction of the trenches; the main priority at this point is to complete construction before the end of the year.
6. Please indicate which specific wells will be abandoned due to the trench construction. Replacement of the abandoned wells may be required in order to continue adequate monitoring.
7. The document states that there are few technologies available to address free-product removal of DEHP other than physical extraction from the host matrix. This statement is not correct. Recent technology advances have increased success of remedial technologies such as steam injection, electrical heating and flushing. It is requested that other technologies be researched in case the trenches do not operate as expected, in which case another technology can be implemented expeditiously.

The above comments must be addressed within sixty (60) calendar days from receipt of this letter. Failure to address these comments within this timeframe may result in stipulated penalties in accordance with paragraph 40 of the September 26, 1986 Administrative Consent Order.

If you have any questions, please contact me at (609) 633-7261.

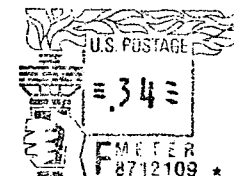
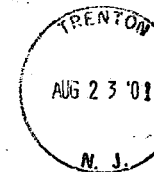
Sincerely,



Gwen B. Zervas, P.E.
Section Manager
Bureau of Case Management

C: Nick Clevett, RMT
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